

Document Electronically Filed

Ronald J. Levine, Esq.
rlevine@herrick.com
David R. King, Esq.
dking@herrick.com
HERRICK, FEINSTEIN LLP
One Gateway Center
Newark, New Jersey 07102
Telephone: (973) 274-2000
Facsimile: (973) 274-2500
*Attorneys for Defendants,
Welch Foods, Inc. A Cooperative and
The Promotion In Motion Companies, Inc.*

**IN THE UNITED STATES DISTRICT COURT
FOR DISTRICT OF NEW JERSEY**

LAUREN HALL, on behalf of herself and
others similarly situated,

Plaintiff,

v.

WELCH FOODS, INC., A COOPERATIVE
and THE PROMOTION IN MOTION
COMPANIES, INC.,

Defendants.

Civil Action No. 18-CV-10500-AET(LHGx)

**DECLARATION OF DANIEL S.
SILVERMAN IN SUPPORT OF THE
ADMISSION OF COUNSEL *PRO HAC VICE***

Daniel S. Silverman, hereby declares pursuant to 28 U.S.C. § 1746:

1. I am a member of the California State Bar, and a Partner at Venable LLP, located in Los Angeles, California. I submit this Declaration in support of my application for admission *pro hac vice*.

2. I am a member in good standing of the California State Bar and have been a member of that Bar since 1989.

3. As required by Local Civil Rule 101.1(c)(1), attached to this Declaration as Exhibit A is a list of the names and addresses of the official(s) and/or office(s) maintaining the roll(s) of the members of the bar of each state, and of each federal court, in which I am admitted to practice.

4. No disciplinary action has ever previously been imposed on me in any jurisdiction, and I know of no disciplinary action pending against me in any jurisdiction. I am not under suspension or disbarment of any court. I am not eligible for admission to the bar of this Court because I am not licensed to practice in New Jersey.

5. Defendants Welch Food, Inc., a Cooperative and The Promotion In Motion Companies, Inc. ("Defendants") have requested that I represent it in this litigation so that it may have the benefit of any experience, knowledge and expertise in false advertising class action litigation.

6. I shall abide by all applicable Rules of Court, including local rules and all disciplinary rules, in the course of my representation of Defendants in this action. I recognize that all lawyers admitted pro hac vice before this Court are within the disciplinary jurisdiction of this Court.

7. I shall notify the Court immediately of any matter affecting my standing at the Bar of any Court.

8. Pursuant to Local Civil Rule 101.1(c), I designate David R. King, Esq. of Herrick, Feinstein LLP, One Gateway Center, Newark, New Jersey 07102, as a member of the Bar of this Court maintaining a bona fide office within the U.S. District Court for the District

New Jersey, upon whom all notices, orders and pleadings may be served, and who may be required to attend before this Court, Clerk or other officer of this Court.

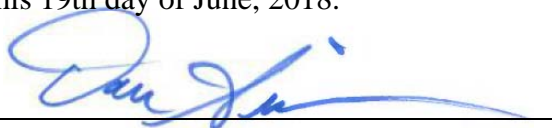
9. I understand my obligations under Local Civil Rule 101.1(c). If admitted *pro hac vice*, payment for such admission shall be promptly remitted to the Clerk, United States District Court, pursuant to Local Rule 101.1(c), and to the New Jersey Lawyer's Fund for Client Protection ("NJLFCP") pursuant to New Jersey Court Rule 1:28-2. I shall continue to make the required annual payments to the NJLFCP for any year in which I continue to represent Defendants in this matter.

10. I agree to take no fee in any tort case before this Court in excess of New Jersey Court Rule 1:21-7 governing contingent fees.

11. Based on the foregoing, together with the supporting documents forwarded herewith, I respectfully request that the Court grant my application to appear *pro hac vice* on behalf of Defendants in the above-captioned matter.

I DECLARE under penalty of perjury, that the foregoing is true and correct.

Executed at Los Angeles, California, this 19th day of June, 2018.



DANIEL S. SILVERMAN

EXHIBIT A

DANIEL S. SILVERMAN**ADMITTED TO PRACTICE BEFORE THE FOLLOWING COURTS**

<u>COURT</u>	<u>DATE OF ADMISSION</u>	<u>GOOD STANDING</u>
U.S. District Court-Southern District of CA	1989	Yes
U.S. District Court-Central District of CA	1991	Yes
U.S. Court of Appeals – 9th Circuit	1992	Yes
U.S. Supreme Court	1995	Yes
U.S. District Court-Northern District of CA	1999	Yes
U.S. District Court-Eastern District of CA	1999	Yes
U.S. Court of Appeals of the Armed Forces	2002	Yes
U.S. Court of Federal Claims	2004	Yes
U.S. Court of Appeals for the Federal Circuit	2005	Yes
U.S. Court of Appeals for the First Circuit	2016	Yes